

Defending the Interests of 75 Million U.S. Homeowners

July 8, 2009

Chairman Julius Genachowski Commissioner Michael Copps Commissioner Robert McDowell

Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: GN Docket No. 09-51: NOI re National Broadband Plan for Our Future

Dear Chairman and Commissioners:

The American Homeowners Grassroots Alliance is the homeowner's consumer advocacy organization supporting federal, state, and local policies that benefit homeowners and encourage homeownership. Broadband technology has become increasingly important to our nation's 75 million homeowners. With this in mind, we submit reply comments to you today, reaffirming our message from our initial filing that it should be the goal of the FCC's National Broadband Plan for every household in America to have a broadband connection.

Homeowners use personal computers and the Internet increasingly to telecommute to their jobs or create home-based businesses. Broadband enables these new business models and expands the workforce to include stay-at-home parents, the disabled, and the retired. A survey by the Hudson Highland Group shows that three out of five Americans would prefer to work from home at least part-time. According to the U.S. Census, there are 18 million home-based businesses. Teleworking is not only convenient, but it also reduces energy consumption and pollution.

As broadband-centric businesses become a reality and increasingly important broadband-based applications are developed, it is critical that all Americans have access. A broadband connection remains out of reach for many low-income and rural households across the country. The plan must focus on how to bring broadband to those who do not have access, cannot afford it, or do not understand its benefits.

We wish that it were feasible to provide all consumers the highest possible broadband speeds in the near future. The costs of doing so clearly exceed the nation's current budget realities. Setting a very high minimally acceptable broadband speed will, as a practical matter, doom many unserved consumers to many additional years of waiting for broadband service. In the meantime there may be inexpensive but somewhat

slower alternatives at hand that could be an acceptable interim solution. In many circumstances those unserved consumers could receive broadband access much sooner, and the speeds could subsequently be upgraded as permitted by new technologies, the federal budget, and/or corporate investment plans.

We are concerned with some of the filings that call for specific speed requirements in the definition of broadband. As we said in our initial comments, the cost of deploying a broadband speed that satisfies the needs of 90% of a given population may be far less than one that satisfies 95% of that population. If the former is not included in the definition of broadband, then the plan may preclude a larger population from receiving affordable broadband at speeds with which they may be satisfied. At this point, we urge the FCC to place emphasis on delivering broadband to all homeowners, as great a number possible, prior to addressing concerns after access is achieved. Those making the deployment decisions need the flexibility to employ cost/benefit considerations rather than arbitrarily walling many unserved consumers off from receiving broadband access for many years into the future.

When Congress passed the American Recovery and Reinvestment Act, they directed that the national broadband plan ensure that all Americans have access to broadband. We hope that the FCC's plan meets this goal, and all Americans are able to benefit from the opportunities that come from a home broadband connection.

Sincerely,

Bruce N. Hahn President

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